

From: Mia, Marcia
Sent: Wednesday, December 19, 2018 07:23 PM
To: Loukeris, Constantinos
Subject: FW: OELs

Thoughts?

Marcia B Mia

Air Branch

Office of Compliance

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U.S. Environmental Protection Agency

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From: Marsh, Karen
Sent: Wednesday, December 19, 2018 11:17 AM
To: Loukeris, Constantinos <loukeris.constantinos@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Cc: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: FW: OELs

Any thoughts on this one? This would actually be bigger LDAR picture, and not just gas plants.

Karen R. Marsh, PE

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From: Brandon Mogan, PE <bmogan@toraconsulting.com>

Sent: Wednesday, December 19, 2018 10:50 AM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: OELs

Karen:

I wanted to shoot you a quick note on the treatment of open-ended valves or lines (OELs). The historic basis of OEL regulation (NSPS VV/VVa) was related to emissions leaking past the seat of a normally closed valve (through-valve leakage). Instead of requiring monitoring of these components to reduce emissions, the regulations require OELs to be eliminated (equipped with a second valve, plug, or flange). Once you put a second valve, plug or flange on an OEL, it no longer meets the definition of an OEL.

See below from the NSPS 0000a preamble:

In the preamble to the final 2012 rule, the EPA stated that subpart VVa lowered the concentration limit defining a leak from 10,000 ppm to 500 ppm. The EPA's action did not revise subpart VVa, but rather changed the application of leak detection and repair provisions by making the LDAR standards of subpart VVa applicable to affected units subject to LDAR under subpart 0000 if the concentration emanating from a leak is 500 ppm or greater. The EPA further stated that monitoring requirements from subpart VVa applied to pumps, pressure relief devices, and open-ended valves or lines at units affected by LDAR under subpart 0000. Although the preamble may have obscured the issue, we clarify here that the monitoring provisions of subpart VVa applicable to affected units of subpart 0000 do not extend to open-ended valves or lines. Given this clarification of preamble language, the EPA can identify no need to modify the regulatory language in response to this petition.

Apparently there has been some confusion on this topic and in the above excerpt the EPA confirms that there are no monitoring requirements for OELs. Some in industry would say that they don't have to monitor a valve that is associated with a former OEL because it has a second valve. This is faulty logic and is inconsistent with the intent of the regs. Leaks from valves are reduced via monitoring. Leaks through valves are reduced by eliminating the OEL.

Our interpretation is that the first valve, which is in contact with process fluid, still qualifies as the "valve" equipment type and must be monitored as such. The second valve, plug, or flange, which is behind a normally closed valve, should not have any process fluid touching it and is therefore not considered "equipment" (not in VOC or in wet gas service). As such, the component eliminating the OEL (second valve, plug, or flange) is not subject to monitoring. Is this consistent with the intent? If so, to minimize confusion, maybe add the following clarification somewhere (i.e., the preamble of the revision to NSPS 0000a)?

The EPA would like to clarify the intended compliance approach for open-ended valves or lines. The equipment leak standards of subpart VV and subpart VVa require that open-ended valves or lines be eliminated via the installation of a second valve, plug, cap, or blind flange. The monitoring requirements do not apply to the "open-ended valves or lines" equipment type because there should not be any such equipment. The lack of monitoring requirements specific to the "open-ended valves or lines" equipment type should not be misconstrued to exempt individual components associated with a former

open-ended valve or line from otherwise applicable monitoring requirements. For example, the first valve (normally closed) associated with a former open-ended valve or line would be subject to the applicable monitoring requirements of subpart VV or subpart VVa if it meets the definition of "equipment". The second valve, plug, cap, or blind flange used to eliminate the open-ended valve or line would not meet the definition of "equipment" and would be exempt from monitoring requirements because it would not be in contact with process fluid (not in VOC service or in wet gas service).

Hope you are doing well, sorry for the ramblings, and Merry Christmas!

Regards,

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